

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FERGUSON FAMILY TRUST, On Behalf
of Itself and All Others Similarly Situated,

Plaintiff,

v.

FALCON STRATEGIES TWO LLC,
AMACAR GP, INC., CITIGROUP
ALTERNATIVE INVESTMENTS LLC,
CITIGROUP, INC. and REAZ ISLAM,

Defendants.

Civil Action No. 08 CIV 4723(SHS)

WHEREAS, the complaint in the above-captioned action is governed by
the provisions of the Private Securities Litigation Reform Act of 1995 ("PSLRA");

IT IS HEREBY STIPULATED AND AGREED, by and between the
undersigned counsel for the parties herein, that:

(a) defendants Falcon Strategies Two LLC, Amacar GP, Inc.,
Citigroup Alternative Investments LLC, Citigroup Inc., and Reaz Islam shall not be
required to answer or otherwise respond to, and are hereby expressly relieved from
answering or otherwise responding to, the complaint in the above-captioned action,
except as otherwise set forth herein;

(b) plaintiff shall have 60 days from the entry of the order pursuant to
the PSLRA appointing Lead Plaintiff(s) and Lead Counsel to file an amended complaint
or consolidated amended complaint, as appropriate (the "Complaint");

(c) the defendants' last day to move, answer or otherwise respond shall
be extended to and include the date 60 days after the filing of the Complaint;

(d) in the event the defendants move to dismiss the Complaint:

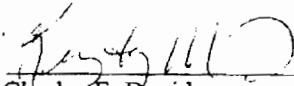
1. plaintiff shall have 60 days from the date such motion is filed to file opposition papers; and

2. the defendants shall have 30 days from the date opposition papers are filed by plaintiff to file reply papers;

(e) pursuant to the applicable provisions of the PSLRA, all discovery shall be stayed until after the Court's ruling on any motion to dismiss.

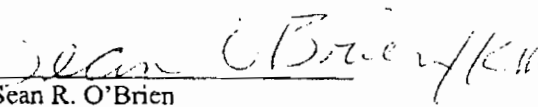
Dated: June 9, 2008
New York, New York

PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP

By: 
Charles E. Davidow
Michael E. Gertzman
Kristy M. Tillman
1285 Avenue of the Americas
New York, New York 10019-6064
Tel.: (212) 373-3000
Fax: (212) 757-3980
cdavidow@paulweiss.com
mgertzman@paulweiss.com
ktillman@paulweiss.com

Attorneys for the Citigroup Defendants

ARKIN KAPLAN RICE LLP

By: 
Sean R. O'Brien
590 Madison Avenue
35th Floor
New York, New York 10022
Tel.: (212) 333-0200
Fax: (212) 333-2350
sobrien@arkin-law.com

Attorneys for Defendant Reaz Islam

COUGHLIN STOIA GELLER RUDMAN
& ROBBINS LLP

By: 

Samuel Rudman
Robert M. Rothman
Joseph Russello
58 South Service Road
Suite 200
Melville, New York 11747
Tel.: (631) 367-7100
Fax: (631) 367-1173
srudman@csgrr.com
rrothman@csgrr.com
jrussello@csgrr.com

Attorneys for Plaintiff

6/10/08

SO ORDERED:


U.S.D.J.